

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, Inc., et al.,

Post-Effective Date Debtors.¹

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

RE: D.I. 1836

**CERTIFICATION OF COUNSEL REGARDING GUC TRUST’S FIRST OMNIBUS
(NON-SUBSTANTIVE) OBJECTION TO CERTAIN CLAIMS
(NO LIABILITY AND DUPLICATE CLAIMS)**

The undersigned counsel for the JOANN Liquidating Trust (the “GUC Trust”) in the above-captioned cases hereby certifies that:

1. On November 7, 2025, the GUC Trust, by and through Steven Balasiano, solely in his capacity as the trustee of the GUC Trust, filed the *GUC Trust’s First Omnibus (Non-substantive) Objection to Certain Claims (No Liability and Duplicate Claims)* [D.I. 1836] (the “Objection”), by which the GUC Trust sought entry of the proposed order attached thereto (the “Proposed Order”) disallowing and expunging (i) certain claims with insufficient information or supporting documentation and (ii) certain duplicate claims.

2. Pursuant to the *Amended Notice of GUC Trust’s First Omnibus (Non-substantive) Objection to Certain Claims (No Liability and Duplicate)* [D.I. 1840], responses to the Objection were required to have been filed with the Court and served no later than December 3, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”). The GUC Trust subsequently

¹ The Post-Effective Date Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

extended the Objection Deadline to December 9, 2025, at 4:00 p.m. (ET) for claimant Saginaw Center, LLC only.

3. Prior to the Objection Deadline, claimant Almaden Properties LLC, filed the *Response and Reservation of Rights with Respect to GUC Trust's First Omnibus Claims Objection* [D.I. 1853] and provided informal comments to the GUC Trust (the "Almaden Response"). On December 3, 2025, the Almaden Response was withdrawn [D.I. 1859].

4. Additionally, prior to the Objection Deadline, the GUC Trust received informal comments to the Proposed Order (the "Informal Responses," and together with the Almaden Response, the "Responses") from counsel to claimants Roxville Associates; Saginaw Center, LLC; Henan QKH Paper Products Co., Ltd.; Evolution Credit Opportunity Master Fund II-B; and MCS Far East, Inc.

5. The GUC Trust has revised the Proposed Order (the "Revised Proposed Order") to resolve the Responses. The Revised Proposed Order is attached hereto as **Exhibit 1**.

6. The resolutions reflected in the Revised Proposed Order have been shared with counsel for the parties that submitted the Responses, and those parties have confirmed their agreement to those resolutions. For the convenience of the Court and all parties in interest, a redline of the Revised Proposed Order, showing changes made from the Proposed Order, is attached hereto as **Exhibit 2**.

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WHEREFORE, the GUC Trust respectfully request that the Revised Proposed Order be entered at the earliest convenience of the Court.

Dated: December 11, 2025

**BENESCH, FRIEDLANDER,
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